

From: [Broyles, Ragan](#)
To: [Webster, Susan](#); [McQuiddy, David](#); [Smith, Monica](#)
Cc: [Delgado, Paige](#)
Subject: FW: West Texas - QAs Discussed in Bob P's Office
Date: Monday, April 22, 2013 11:14:20 AM

-----Original Message-----

From: Coleman, Sam
Sent: Monday, April 22, 2013 10:45 AM
To: Broyles, Ragan; Edlund, Carl; Ruhl, Christopher
Subject: FW: West Texas - QAs Discussed in Bob P's Office

Did e-Plan have the ammonium nitrate and other pesticides listed?

-----Original Message-----

From: Corman, Bicky
Sent: Monday, April 22, 2013 8:14 AM
To: Gray, David; Rivas-Vazquez, Victoria; O'Hara, James; Grantham, Nancy; Stanton, Larry; Stanislaus, Mathy; Coleman, Sam
Cc: Johnson, Alisha
Subject: RE: West Texas - QAs Discussed in Bob P's Office

You probably saw in the Washington Post

The Post's View

Texas plant explosion: Worst-case scenario?

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More

By Editorial Board, Published: April 20

The giant explosion that rocked a fertilizer storage facility in West, Tex., last Wednesday ought to mandate a hard look by the federal government at rules governing the booming chemicals business. The country's sudden abundance of cheap natural gas, a primary input in the manufacture of many things, including artificial fertilizer, has begun to attract chemical companies back to the United States, which certainly could use the jobs. But, as with any big industrial operation, chemicals manufacturing and storage brings a host of risks, toxic and explosive.

The right response is simple: Make companies comprehensively assess the risks they and those around their facilities face. Then they can take reasonable steps to guard against those risks and plan what to do when everything goes wrong. Wednesday night's explosion, in other words, should not have been a total surprise, but a worst-case scenario the company had anticipated and prepared for.

As it stands, the federal regulatory system is far from simple, and it certainly could be more effective.

Journalists have already picked apart a 2011 risk assessment from West Fertilizers that the Center for Effective Government printed on its Web site. In it, the company told the Environmental Protection Agency that it had 54,000 pounds of anhydrous ammonia on site, but that there was no danger of fire or explosion. Following Wednesday's disaster, that claim seems to be tragically negligent.

Yet it probably stems from the fact that the EPA's rules only cover gases such as ammonia, which is flammable only in extreme heat. There was another more volatile chemical on site, ammonium nitrate, that the EPA heard nothing about, because it is a solid. To store large amounts of ammonium nitrate, the company needed to file notice not with the EPA, but with the Department of Homeland Security, which reports suggest the company did not do.

Even if it had, it's bizarre that all of this information wasn't in the same place. Shouldn't the possibility

that the ammonium nitrate could ignite and explode have demanded that the company consider the chance that it would light up the ammonia? Risks shouldn't just be considered in isolation from one another; companies must contemplate how they might interact.

The federal Occupational Safety and Health Administration, meanwhile, has its own domain of jurisdiction over these companies, but it hadn't inspected the West Fertilizer plant since 1985, which, The Post's Brad Plumer points out, might have something to do with a shortage of inspectors.

The industry says that what happened in West is extremely rare. But, at the least, the accident has exposed the federal regulatory morass in which the industry operates. Every regulator with any kind of responsibility for West Fertilizers now seems to be investigating what happened last Wednesday night, along with an independent federal inquiry. They shouldn't shy from telling Congress and President Obama how to make the system more rational.

Bicky Corman
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-----Original Message-----

From: Gray, David
Sent: Friday, April 19, 2013 1:23 PM
To: Rivas-Vazquez, Victoria; O'Hara, James; Grantham, Nancy; Stanton, Larry; Stanislaus, Mathy; Corman, Bicky; Coleman, Sam
Cc: Johnson, Alisha
Subject: RE: West Texas - QAs Discussed in Bob P's Office

Looks good to me. Thanks everyone for the help.

-----Original Message-----

From: Rivas-Vazquez, Victoria
Sent: Friday, April 19, 2013 12:19 PM
To: Gray, David; O'Hara, James; Grantham, Nancy; Stanton, Larry; Stanislaus, Mathy; Corman, Bicky; Coleman, Sam
Cc: Johnson, Alisha
Subject: West Texas - QAs Discussed in Bob P's Office

HERE ARE QAs WITH BOB P's EDITS:

Is the EPA investigating the adequacy of the company's risk management plan?

We got the plan two years ago and reviewed it. The worse case scenario was an accidental release of all 54,000 pounds of anhydrous ammonia into the community. At room temperature anhydrous ammonia is a gas. This scenario is a plausible worse-case scenario as gaseous anhydrous ammonia can be lethal.

Do you suspect there were chemicals such as ammonium nitrate stored there that were not included in their risk management plan?

Clean Air Act (CAA) 112r requires a facility to address catastrophic accidental air releases of chemicals in its Risk Management Plan. Ammonium nitrate, a solid, is not currently a chemical material addressed by this provision of the CAA. We do not yet know what happened at this facility. The ongoing investigation will inform us on the plan's adequacy. In addition, the investigation will review if there are any violations. Based on the results of this investigation, EPA review if changes are required.